

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LISA BROWN, M.D.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-32 E
)	
HAMOT MEDICAL CENTER,)	
)	
Defendant.)	

MOTION FOR ISSUANCE OF REVISED CASE MANAGEMENT ORDER

Defendant Hamot Medical Center, through its undersigned counsel, hereby moves the Court for the issuance of a new Scheduling Order and states the following:

1. On April 13, 2006, the Honorable Maurice B. Cohill, Jr. issued an Order granting the parties Joint Motion To Extend Deadlines and Stay Proceedings and Joint Request for Court-Ordered Mediation Before A Magistrate Judge. Among other things, Judge Cohill's Order required the parties to submit to mediation on or before June 15, 2006, and, if the mediation was unsuccessful, to notify the Court for the issuance of a revised case management order.

2. On June 14, 2006, the parties participated in the court-ordered mediation, but were unable to settle this case.

3. At this time, defendant respectfully requests that this Court issue a new case management order setting forth the following deadlines:

Dispositive Motions Due	August 15, 2006
Oppositions to Dispositive Motions Due	September 15, 2006
Reply to Oppositions Due	September 29, 2006
Dispositive Motions Decided	November 3, 2006
Plaintiff's Pretrial Statement Due	November 24, 2006

Defendant's Pretrial Statement Due	December 8, 2006
Motions in Limine Due	January 5, 2007
Oppositions to Motions In Limine Due	January 15, 2007
Pretrial Conference	January ____, 2007 at _____

4. On June 30, 2006, counsel for defendant e-mailed plaintiff's counsel and requested his consent to this motion and to the proposed dates. To date, plaintiff's counsel has not responded to the undersigned's request.

WHEREFORE, defendant requests that the Court grant their Joint Motion for Issuance of Revised Case Management Order. A proposed order is attached.

Respectfully submitted,

Tobin O'Connor Ewing & Richard

/s/ Kerry M. Richard
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